

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 5 CASES LISTED IN
EXHIBIT A TO PLAINTIFFS' NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES
REGARDING CHRISTINA PRAMUDJI FOR WAVE 5**

Plaintiffs filed a Notice of Adoption [Dkt. 4399] in the Wave 5 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Christina Pramudji, M.D. and Supporting Memorandum from Wave 1 [Dkt. 2035; 2037]. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Christina Pramudji, M.D. for Ethicon Wave 1 [Dkt. 2153] and Ethicon Wave 2 [Dkt. 2530]. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1 and Wave 2 response briefing.

Respectfully submitted,

ETHICON, INC., ETHICON LLC AND
JOHNSON & JOHNSON

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)
Thomas Combs & Spann, PLLC
300 Summers Street, Suite 1380
P.O. Box 3824
Charleston, WV 25558-3824
(304) 414-1800

/s/ Christy D. Jones

Christy D. Jones

Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones